

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE: MULTIPLAN HEALTH
INSURANCE PROVIDER LITIGATION

This Document Relates To:

ALL ACTIONS

Case No. 1:24-cv-6795

MDL No. 3121

Hon. Matthew F. Kennelly

**DECLARATION OF GRAHAM HAVILAND IN SUPPORT OF MULTIPLAN INC.’S
OPPOSITION TO PLAINTIFFS’ MOTION TO COMPEL MULTIPLAN’S
PRODUCTION OF DOCUMENTS CONCERNING MEDICAL AUDIT AND REVIEW
SOLUTIONS (“MARS”)**

I, Graham Haviland, declare as follows:

1. I am an attorney with the law firm Latham & Watkins LLP, attorneys for Defendant MultiPlan, Inc. (“MultiPlan”) in connection with this action. I submit this Declaration in support of MultiPlan’s Opposition to Plaintiffs’ Motion to Compel MultiPlan’s Production of Documents Concerning Medical Audit and Review Solutions (“MARS”).

2. Attached as **Exhibit A** to this Declaration is a true and correct copy of a Presentation titled “2018 Client Advisory Board Meeting[:] Payment Integrity Focus” by MultiPlan, produced by MultiPlan in this litigation with Bates number MPI_0000142536.

3. The parties met and conferred several times regarding the relevance of MARS, including on November 3, 2025. During the parties’ November 3 meet and confer on this issue, Plaintiffs’ counsel stated that Plaintiffs did not view MARS’s characterization as a “payment integrity” product as pertinent for discovery purposes. MultiPlan’s counsel expressly stated that MultiPlan was not relying on that characterization of the service, stating: “I don’t think it’s ever been our position that a label is dispositive or even relevant.

Our issue is that this is a service that's looking for coding errors, billing mistakes, and that is fundamentally different from the repricing of claims, Data iSight, and negotiations.”

I declare under penalty of perjury that the foregoing is true and correct, and that this Declaration was made this 21st day of November 2025.

A handwritten signature in black ink, appearing to read "Graham Haviland", written over a horizontal line.

Graham Haviland
of Latham & Watkins LLP

Counsel for Defendant MultiPlan, Inc.